Moore&VanAllen

January 31, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210 Robert R. Smith, II

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Re: **Docket No. 2019-381-E** – Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish a Consolidated Informational Docket for Review and Consideration of Grid Improvement Plans

Dear Ms. Boyd:

In its January 15, 2020 directive, the Commission requested comments on procedural schedule and intervention issues in this proceeding. These comments are submitted on behalf of Nucor Steel-South Carolina, a Division of Nucor Corporation ("Nucor"), a large industrial customer of Duke Energy Process, LLC.

Since this docket is solely an informational docket, we do not see the need for a procedural schedule at this point. Similarly, we do not see a need for parties to formally intervene in the proceeding in order to participate. However, if intervention is required, Nucor agrees with Walmart that parties who have been granted intervention in Docket Nos. 2018-318-E and/or 2018-319-E should be deemed to have intervened in this proceeding as a matter of right without the need for filing a new intervention.

Finally, we believe that a party's manner of participation (or lack of participation) in this informational docket should not prejudice a party's ability to conduct discovery or develop and/or advocate positions on grid improvement plan issues in future rate proceedings or other contested cases.

Nucor appreciates the opportunity to comment on this matter. Please contact me if you have any questions.

Sincerely,

Robert R. Smith II

Counsel for Nucor Steel - South Carolina

RRS

cc: All Parties of Record (via e-mail)